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HUKILL CHEMICAL CORPORATION

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*Over Forty Years of Quality Products and Services***CERTIFIED MAIL**

Ms. Marlene Emanuelson
Ohio EPA
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

RECEIVED

DEC 12 1994

December 7, 1994

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Dear Ms. Emanuelson:

Per our conversation last week, Hukill Chemical Corporation (HCC) has revised their form for "Notification of Hazardous Waste Restricted From Land Disposal." This form is normally referred to by us as the Land Ban Form.

HCC plans to begin using the new form on or before 12/19/94, the effective date for the new universal treatment standards regulations. As we previously discussed, Linda Welch's memo to HCC dated 10/12/94 states that OEPA takes the position that we may operate in accordance with the federal treatment standards until Ohio is able to adopt equivalent rules.

I have enclosed two copies of the revised HCC Land Ban form to update your copies of HCC's Part B Application. This is Exhibit C-10 in Section C of the HCC application.

If you have any questions or comments on the above, please call me at Hukill Chemical, phone (216) 232-9400.

Sincerely yours,

Edgar M. Price
Engineering Consultant

cc: Tom Crepeau, OEPA, Col
Harriet Croke, Chief, Ohio Section, Region V, U.S. EPA
Robert L. Hukill, President
Mike Mraz, Plant Manager

Notification of Hazardous Waste Restricted From Land Disposal

Ref. 40 CFR Part 268, Land Disposal Restrictions.

Hukill Chemical Corporation (EPA I.D. OHD001926740)

Keep one copy for your files.

HCC510 Rev. 11/94

SECTION 1. Generator Information

Name: _____ EPA I.D. # _____

Address: _____

MANIFEST # _____ LINE _____ APPROVAL NO. _____

(Use a separate form for each line number (11a, 11b, 11c, 11d) on your manifest.)

EPA WASTE CODES

The Treatability Group for this waste is a Wastewater or a Nonwastewater.

Please check one.

(A Wastewater contains less than 1% F001-F005 constituents or, if not an F001 - F005 Waste, less than 1% by weight Total Organic Constituents (TOC's) AND less than 1% Total Suspended Solids (TSS) Otherwise, it is a Nonwastewater.)

☐ NONWASTEWATER
☐ WASTEWATER

SECTION II. F001 - F005 Spent Solvents

Please check the appropriate box for each statement.

The following checked constituents are present in this F001 - F005 Waste:

<input type="checkbox"/> Acetone	F003	<input type="checkbox"/> Methanol *	F003
<input type="checkbox"/> Benzene	F005	<input type="checkbox"/> Methylene Chloride	F001 or F002
<input type="checkbox"/> n-Butyl Alcohol	F003	<input type="checkbox"/> Methyl Ethyl Ketone (MEK)	F005
<input type="checkbox"/> Carbon Disulfide *	F005	<input type="checkbox"/> Methyl Isobutyl Ketone (MIBK)	F003
<input type="checkbox"/> Carbon Tetrachloride	F001	<input type="checkbox"/> Nitrobenzene	F004
<input type="checkbox"/> Chlorobenzene	F002	<input type="checkbox"/> Pyridine	F005
<input type="checkbox"/> o-Cresol	F004	<input type="checkbox"/> Tetrachloroethylene	F001 or F002
<input type="checkbox"/> m-Cresol	F004	<input type="checkbox"/> Toluene	F005
<input type="checkbox"/> p-Cresol	F004	<input type="checkbox"/> 1,1,1-Trichloroethane	F001 or F002
<input type="checkbox"/> Cresol-mixed isomers	F004	<input type="checkbox"/> 1,1,2-Trichloroethane	F002
<input type="checkbox"/> Cyclohexanone *	F003	<input type="checkbox"/> 1,1,2-Trichloro - 1,2,2-Trifluoroethane	F001 or F002
<input type="checkbox"/> 1,2-Dichlorobenzene	F002	<input type="checkbox"/> Trichloroethylene	F001 or F002
<input type="checkbox"/> Ethyl Acetate	F003	<input type="checkbox"/> Trichlorofluoromethane	F001 or F002
<input type="checkbox"/> Ethyl Benzene	F003	<input type="checkbox"/> Xylenes (Total)	F003
<input type="checkbox"/> Ethyl Ether	F003	<input type="checkbox"/> 2-Nitropropane **	F005
<input type="checkbox"/> Isobutanol	F005	<input type="checkbox"/> 2-Ethoxyethanol ("Cellosolve") **	F005

*If any or all three of these constituents are present in Nonwastewater as the ONLY F001-F005 constituents, treatment standards apply.

** Treatment Standards only apply if either of these constituents is the ONLY listed F001-F005 solvent in an F005 Waste.

SECTION III. California List Prohibitions

Check the appropriate box (es) if the waste contains the following LIQUID hazardous wastes or free liquids which contain:

☐ PCB's: NOT ACCEPTED by Hukill Chemical above 25 ppm.
☐ Halogenated Organic Compounds (HOC's) in total concentrations greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (nonliquids), but not listed or characterized as containing HOC's.

A "D" Waste that also contains metals or compounds with metals at mg/L concentrations as follows:

☐ Arsenic > 500; ☐ Mercury > 20; ☐ Nickel > 134; ☐ Thallium > 130

SECTION IV. Characteristic Wastes - Common "D" Waste Codes

Please check the following box(es) for codes that apply to this waste:

EPA WASTE CODE	CONSTITUENT or CHARACTERISTIC	SUBCATEGORY	EPA WASTE CODE	CONSTITUENT or CHARACTERISTIC	SUBCATEGORY
<input type="checkbox"/> D001	Ignitability	High TOC Ignitable Liquids.	<input type="checkbox"/> D029	1,1-Dichloroethylene	N/A
<input type="checkbox"/> D002	Corrosivity	Managed in non-CWA-equivalent/non-Class I SDWA systems.	<input type="checkbox"/> D035	Methyl Ethyl Ketone	N/A
<input type="checkbox"/> D004	Arsenic	N/A	<input type="checkbox"/> D039	Trtrachloroethylene	N/A
<input type="checkbox"/> D005	Barium	N/A	<input type="checkbox"/> D040	Trichloroethylene	N/A
<input type="checkbox"/> D006	Cadmium	N/A	<input type="checkbox"/> U002	Acetone	N/A
<input type="checkbox"/> D007	Chromium (total)	N/A	<input type="checkbox"/> U019	Benzene	N/A
<input type="checkbox"/> D008	Lead	N/A	<input type="checkbox"/> U031	n-Butyl Alcohol	N/A
<input type="checkbox"/> D009	Mercury	Low Mercury - < 260 mg/kg	<input type="checkbox"/> U037	Chlorobenzene	N/A
<input type="checkbox"/> D010	Selenium	N/A	<input type="checkbox"/> U052	Cresols	N/A
<input type="checkbox"/> D011	Silver	N/A	<input type="checkbox"/> U080	Methylene Chloride	N/A
<input type="checkbox"/> D018	Benzene	N/A	<input type="checkbox"/> U112	Ethyl Acetate	N/A
<input type="checkbox"/> D019	Carbon Tetrachloride	N/A	<input type="checkbox"/> U121	Trichloromonofluoromethane	N/A
<input type="checkbox"/> D021	Chlorobenzene	N/A	<input type="checkbox"/> U140	Isobutyl Alcohol	N/A
<input type="checkbox"/> D023	o-Cresol	N/A	<input type="checkbox"/> U154	Methanol	N/A
<input type="checkbox"/> D024	m-Cresol	N/A	<input type="checkbox"/> U159	Methyl Ethyl Ketone	N/A
<input type="checkbox"/> D025	p-Cresol	N/A	<input type="checkbox"/> U161	Methyl Isobutyl Ketone	N/A
<input type="checkbox"/> D026	Cresols (Total)	N/A	<input type="checkbox"/> U213	Tetrahydrofuran	N/A
<input type="checkbox"/> D027	1,4-Dichlorobenzene	N/A	<input type="checkbox"/> U220	Toluene	N/A
<input type="checkbox"/> D028	1,2-Dichloroethane	N/A	<input type="checkbox"/> U226	1,1,1-Trichloroethane	N/A
			<input type="checkbox"/> U239	Xylenes	N/A

SECTION V. Other EPA Waste Codes

List any "U", "K" or "D" Waste Codes not found in Section II or IV. Refer to Hukill Chemical Corporation's Approved Waste Code Listing. Select the proper waste code for this waste. Enter under the appropriate heading:

EPA WASTE CODE	CONSTITUENT or CHARACTERISTIC	SUBCATEGORY	EPA WASTE CODE	CONSTITUENT or CHARACTERISTIC	SUBCATEGORY

SECTION VI. Certification

The above waste stream conforms to the description of and is identified as a restricted waste. It must meet the treatment standards for the constituents listed above before it qualifies for disposal in a secure landfill. This notification is based upon (Please Check One): ☐ Attached Analysis ☐ Knowledge of Waste and Generating Process

Signature/Title: _____

(This must be an authorized signature certifying the information)

Printed Name: _____

Date of Shipment: _____